

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Mori Lee, LLC)	
)	
v.)	Case No. 1:19-cv-7555
)	
THE PARTNERSHIPS and)	Judge: Matthew F. Kennelly
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A,")	Magistrate: Young B. Kim
)	
)	
)	
_____)	

**PLAINTIFF'S *EX PARTE* MOTION FOR LEAVE TO TEMPORARILY SEAL
DOCUMENTS**

Pursuant to Local Rule 5.8 and Fed. R. Civ. P. 26(c)(1), Plaintiff, Mori Lee, LLC ("Plaintiff") files this Motion for Leave to Temporarily Seal Documents ("Motion to Seal") requesting leave to file the following documents under seal: (1) Plaintiff's Complaint and Schedule "A" attached to the Complaint that includes a list of the infringing websites; and (3) screenshot printouts from the infringing websites showing instances of trademark and copyright infringement (Exhibit A and B to the Declaration of Marco Montenegro).

In this case, Plaintiff is requesting temporary ex parte relief based on an action for trademark counterfeiting and false designation of origin under the Lanham Act, copyright infringement under the Copyright Act, and deceptive trade practices under Illinois State law. Sealing these limited portions of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence, the hiding or transferring of assets to foreign jurisdictions, and the

transfer or disablement of the infringing websites. See Declaration of Suren Ter Saakov at ¶¶ 11-13. Such acts would frustrate the purposes of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will promptly move to unseal these documents.

Dated this 18th Day of November 2019.

Respectfully submitted,

By: s/David Gulbransen/
David Gulbransen
Attorney of Record
Counsel for Plaintiff

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